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TABLE 2
Summary of gemifloxacin and comparator activity against
Streptococcus pneumoniae from in vitro profile studies

Compound	No. of Isolates	MIC Range (μg/mL)	Range of MIC ₉₀ s (μg/mL)	Median MIC ₉₀ (μg/mL)	References
S. pneumoniae (not differentiated)					
Gemifloxacin	185	≤0.008-0.06	0.03-0.06	0.03	[33] [36]
Clinafloxacin	100	0.03-0.25	0.12	NA ¹	[33]
Moxifloxacin	185	≤0.02-0.25	0.25	0.25	[33] [36]
Trovafloxacin	185	≤0.02-0.25	0.12	0.12	[33] [36]
Levofloxacin	185	0.12-2	1	1	[33] [36]
Ciprofloxacin	185	0.06-8	1-2	1	[33] [36]
S. pneumoniae (Pen-S)			_		
Gemifloxacin	261	≤0.004-0.25	0.03-0.06	0.06	[37] [35] [34] [39]
Moxifloxacin	196	0.06-0.25	0.25	0.25	[37] [39]
Trovafloxacin	261	≤0.008-1	0.12-0.25	0.25	[37] [35] [34] [39]
Levofloxacin	239	0.06-4	1-2	2	[35] [34] [39]
Ciprofloxacin	261	0.12-8	1-4	2	[37] [35] [34] [39]
S. pneumoniae (Pen-I)					
Gemifloxacin	72	≤0.008-0.12	0.03-0.12	0.03	[37] [35] [34] [39]
Moxifloxacin	39	0.06-0.25	0.12-0.25	0.12	[37] [39]
Trovafloxacin	72	≤0.03-0.5	0.12-0.5	0.25	[37] [35] [34] [39]
Levofloxacin	59	0.12-4	1-2	2	[35] [34] [39]
Ciprofloxacin	72	0.25-4	1-4	. 2	[37] [35] [34] [39]
S. pneumoniae (Pen-R)					
Gemifloxacin	51	≤0.004-1	0.03-0.12	0.03	[37] [35] [34]
Moxifloxacin	10	0.06-0.12	0.12	NA	[37]
Trovafloxacin	51	≤0.03->8	0.12->8	0.25	[37] [35] [34]
Levofloxacin	41	0.5->16	1->16	1	[35] [34]
Ciprofloxacin	51	0.25->8	1->8	1	[37] [35] [34]

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TABLE 2 (continued)
Summary of gemifloxacin and comparator activity against
Streptococcus pneumoniae from in vitro profile studies

Compound	No. of	MIC Range	Range of	Median	References
	Isolates	(μg/mL)	MIC ₉₀ s	MIC ₉₀	
			(μg/mL)	(μg/mL)	. 1
S. pneumoniae (Quin-S)2					
Gemifloxacin	332	≤0.008-0.25	0.06	0.06	[32] ³ [40] ⁴
Clinafloxacin	125	0.06-0.25	0.12	NA	[32]3
Trovafloxacin	332	0.016-1	0.25	0.25	[32] ³ [40] ⁴
Levofloxacin	332	0.12-4	2	2	[32] ³ [40] ⁴
Ciprofloxacin	207	0.25-4	4	NA NA	[40] ⁴
S. pneumoniae (Quin-R) ²				1	
Gemifloxacin	160	≤0.03-2	0.25-1	0.5	[32] ⁵ [38] ⁷ [40] ⁶
Clinafloxacin	57	0.25-4	1	NA	[32] ⁵
Moxifloxacin	75	0.12-8	4	NA	[32] ⁵ [38] ⁷ [40] ⁶
Trovafloxacin	160	0.25->8	4-8	4	[32] ⁵ [38] ⁷ [40] ⁶
Levofloxacin	160	0.5->32	16->32	>16	[32] ⁵ [38] ⁷ [40] ⁶
Ciprofloxacin	103	4->32	32->32	32	[38] ⁷ [40] ⁶

NA = Not applicable—insufficient data to determine a median value

TABLE 3 shows the results of individual profile studies. In all of these studies gemifloxacin had low MIC values. The MIC $_{90}$ value was $\leq 0.06~\mu g/mL$, except in studies that tested quinolone-resistant strains. In studies that tested quinolone-resistant strains the MIC $_{90}$ was 0.5-1.0 $\mu g/mL$ (in the resistant category for gemifloxacin). The MIC $_{90}$ value for gemifloxacin was usually 2-fold lower than that of clinafloxacin and about 4- to 8-fold lower than that of moxifloxacin or gatifloxacin. Gemifloxacin's MIC $_{90}$ value was usually 32- to 64-fold better than that of levofloxacin or ciprofloxacin.

² defined in individual studies

³ Levofloxacin MIC ≤ 2 μg/mL

⁴ Ciprofloxacin MIC ≤ 4 μg/mL

⁵ Levofloxacin MIC ≥ 8 μg/mL

⁶ Ciprofloxacin MIC ≥ 8 μg/mL

⁷ Ciprofloxacin MIC ≥ 4 μg/mL

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TABLE 3
Activity of Gemifloxacin Against

Streptococcus pneumoniae (individual studies)

Compound	No. of Isolates	Country	MIC Range (μg/mL)	MIC ₅₀ (μg/mL)	MIC ₉₀ (μg/mL)	Reference
Gemifloxacin	347	USA	0.004-0.06	0.016	0.03	F441
		USA		0.015	0.03	[41]
Gemifloxacin	80		≤0.004-1			[34]
Gemifloxacin	59	USA	0.008-0.03	0.03	0.03	[35]
Gemifloxacin	207	USA	≤0.008-0.25	0.03	0.06	[40]
Gemifloxacin	64 Pen-S		≤0.008-0.25	0.015	0.03	
•	68 Pen-l		≤0.008-0.25	0.015	0.06	
	75 Pen-R		≤0.008-0.25	0.03	0.06	
	28 Cipro ≥ 8		0.03-1.0	0.25	0.5	
Gemifloxacin	182	N.A.	0.015-0.12	0.03	0.06	[32]
Gemifloxacin	57 Levo ≥8	EURO	0.06-2	0.25	120	
Gemifloxacin	. 85	Canada	≤0.02-0.06	0.03	0.06	[36]
Gemifloxacin	45	Canada			0.03	[37]
Gemifloxacin	75 Cipro ≥ 4	Canada	≤0.03-1	0.06	0.25	[38]
Gemifloxacin	174	Germany		0.03	0.06	[39]
Gemifloxacin	100	Italy	≤0.008-0.06	0.015	0.03	[33]
Gemifloxacin	134 E-test	Greece	0.002-0.25	0.03	0.06	[43]
Gemifloxacin	373 Pen-S	CMI	≤0.008-0.25	0.03	0.06	[31]
	93 Pen-l	1	0.016-0.12-	0.03	0.06]
	110 Pen-R	1	0.016-0.12	0.03	0.06]
Gemifloxacin	552	CAST		0.015	0.015	[30]
Gemifloxacin	2409	Global	0.001-128	0.015	0.03	[28]
	1515 Pen-S	7		0.015	0.03]
	521 Pen-l]		0.015	0.03]
	372 Pen-R			0.015	0.03	
	78 Cip-R	7	0.008—128	0.06	035	1

Shaded values are greater than the susceptible breakpoint for gemifloxacin.

Surveillance Studies

Table 4 and Table 5 show gemifloxacin MIC₅₀, MIC₉₀, and range for Streptococcus pneumoniae tested from The Global Gemifloxacin Surveillance Study (GGSS) (28), The Alexander Project (29), CAST (30), and CMI (31). The range of MIC₉₀s in the US/Canada was 0.015-0.06 μ g/mL, and 0.03 μ g/mL for all geographic regions.

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TABLE 4

In vitro Activity of Gemifloxacin against 3,005 S. pneumoniae from Surveillance Studies (US/Canada)

Study	Number of Isolates	MIC ₅₀ (μg/mL)	MIC ₉₀ (μg/mL)	MIC Range (μg/mL)
GGSS	421	0.015	0.03	0.004-2.0
Alexander Project	1,456	0.015	0.03	≤0.004-0.5
CAST	552	0.015	0.015	≤0.004-0.5
CMI	576	0.03	0.06	≤0.008-0.25

TABLE 5

In vitro Activity of Gemifloxacin against 7321 S. pneumoniae from Surveillance Studies (All geographic regions)

Study	Number of Isolates	MIC ₅₀ (μg/mL)	MIC ₉₀ (μg/mL)	MIC Range (μg/mL)
GGSS /	2409	0.015	0.03	0.001-128.0
Alexander Project	4012	0.015	0.03	≤0.004-0.5
CAST	897	0.015	0.03	≤0.004-2.0

TABLE 6 shows the frequency distribution of gemifloxacin and comparator MICs for *Streptococcus pneumoniae* from surveillance studies in all geographic regions. TABLE 7 shows the frequency distribution for the US/Canada surveillance studies.

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TABLE 6

Frequency Distribution of MICs for S. pneumoniae in Surveillance Studies

(all geographic regions)

								geogra			1	2	4	8	16	32	Total
N/Cum%	0.001	0.002	0.004	0.008	0.015	0.03	0.06	0.12	0.25	0.5					 		7896
Gemifloxacin	13	24	81	808	3984	2656	258	37	16	10	9					1	,,,,,,
Germioxacin	0.16	0.47	1.49	11.73	62.18	95.82	99.09	99.56	99.76	99.89	100*						7891
	0.10	0.77	1.40		8	1	2	12	44	1007	4733	1858	225				7091
Ciprofloxacin					0.10	0.11	0.14	0.29	0.85	13.61	73.59	97.14	100*				0.400
			<u> </u>		69	147	246	1213	668	44	4	4	4	4	2	3	2408
Grepafloxacin						1	19.19	69.56	97.30	99.13	99.29	99.46	99.63	99.79	99.88	100*	
					2.87	8.97		10	60	1450	1905	61	6	21			3538
Levofloxacin				1	12	2	10	1		43.67	97.51	99.24	99.41	100*			
20101111111111				0.03	0.37	0.42	0.71	0.99	2.69			4989	302	33			6420
Ofloxacin							20	4	11	28	1033			100*			
Olloxacin						ĺ	0.31	0.37	0.55	0.98	17.07	94.78	99.49	100	 	 	3883
		ļ		1	22	48	789	2401	553	29	14	2	14	9			3003
Trovafloxacin				0.03	0.59	1.83	22.15	83.98	98.22	98.97	99.33	99.38	99.77	100*	<u> </u>	J	

^{*} Highest concentration tested in one or more of the studies.

TABLE 7 Frequency Distribution of MICs for *S. pneumoniae* in Surveillance Studies (US/Canada)

					((JS/Can					4	8	Total
N/Cum%	0.004	0.008	0.015	0.03	0.06	0.12	0.25	0.5	11		4		3317
Gemifloxacin	28	381	1650	1114	115	11	9	5	4				3317
Germinoxacin	0.84	12.33	62.07	95.66	99.13	99.46	99.73	99.88	100*				0047
O: O	0.04	12.00	02.0.			2	11	414	2119	713	58		3317
Ciprofloxacin			ļ			0.06	0.29	12.87	76.76	98.25	100*		
			5	2	30	230	146	5			3		421
Grepafloxacin	1]	1.19	1.66	8.79	63.42	98.10	99.29			100		
				1.00	1	1	12	462	1034	23	2	10	1551
Levofloxacin		1	4		0.39	0.45	1.29	31.08	97.74	99.23	99.36	100*	
	<u> </u>	0.03	0.32		0.55	0.40	2	3	277	1532	57	6	1877
Ofloxacin							0.11	0.27	15.02	96.64	99.68	100*	
						1010		13	10.02	1	13	1	1861
Trovafloxacin		1	5	17	236	1212	358	1	99.19	99.25	99.95	100*	
	ļ	0.05	0.32	1.24_	13.92	79.04	98.28	98.98	35.15	33.20	00.00		1

^{*} Highest concentration tested in one or more of the studies.

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Figures 1 and 2 show the *Streptococcus pneumoniae* gemifloxacin data from the surveillance studies in bar graphs. Figure 1 shows the data for the US/Canada studies and Figure 2 shows the data for all geographic regions.

Figure 1 Frequency distribution of gemifloxacin MICs for S. pneumoniae from surveillance studies - US/Canada (n = 3,317)

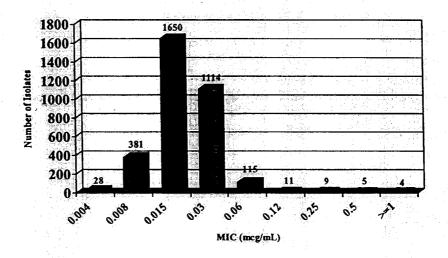
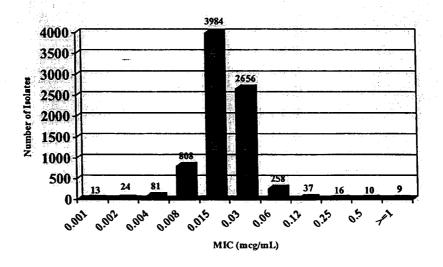


Figure 2 Frequency distribution of gemifloxacin MICs for S. pneumoniae from surveillance studies - all geographic regions (n = 7,896)



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Clinical data

This section contains frequency distributions of the gemifloxacin MICs for Streptococcus pneumoniae isolated from the Intent to Treat population during the Phase III clinical studies. The MIC₉₀ for the isolates recovered in North America was 0.015 μ g/mL (TABLE 8), and 0.03 μ g/mL for the isolates from all geographic regions (TABLE 9).

TABLE 8
Frequency Distribution of MICs for Gemifloxacin for *S. pneumoniae*From the Phase III Clinical Studies (North America)

N=77	≤0.001	0.002	0.004	0.008	0.015	0.03
Gemi n	2	0	1	35	36	3
Cum %	2.6	2.6	3.9	49.4	96.1	100

TABLE 9
Frequency Distribution of MICs for Gemifloxacin for S. pneumoniae
From the Phase III Clinical Studies (all geographic regions)

						3 3 <u>- 1- 1</u> -			
N=386	≤0.001	0.002	0.004	0.008	0.015	0.03	0.06	0.12	0.25
Gemi n	6	4	1	65	258	48	1	2	1
Cum %	1.6	2.6	2.8	19.7	86.5	99.0	99.2	99.7	100

Discussion

The studies outlined above demonstrate that gemifloxacin has good activity against Streptococcus pneumoniae. In most studies gemifloxacin MIC90s were 4-fold lower than the other quinolones tested. It must be remembered, however, that most other fluoroquinolones will have susceptible breakpoints that are at least 4 to 8 times higher than that for gemifloxacin. Streptococcus pneumoniae strains that have low-level resistance to levofloxacin and ciprofloxacin may still be susceptible to gemifloxacin. Gemifloxacin, like the other fluoroquinolones maintained its activity against penicillinresistant and macrolide-resistant strains. Streptococcus pneumoniae will be allowed in the label. At the present time the Division is not allowing a claim in the label against macrolide-resistant S. pneumoniae. The Division believes that at the present time these strains are not a significant health risk. It will have to be determined whether enough patients infected with penicillin-resistant strains were cured to allow a claim for these strains. If this claim is allowed then Streptococcus pneumoniae (including penicillinresistant strains) will be allowed in list #1 (clinical efficacy) in the microbiology subsection of the label. If this claim is not allowed then the microbiology subsection will list Streptococcus pneumoniae (penicillin-susceptible strains) in list #1 (clinical efficacy) and Streptococcus pneumoniae (penicillin-resistant strains) in list #2 (in vitro activity only).

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Other Gram-Positive Aerobes

To determine the activity of gemifloxacin against Gram-positive aerobes, other than Streptococcus pneumoniae, a number of in vitro susceptibility studies were conducted. Organisms tested included Streptococcus pyogenes, Streptococcus agalactiae, Staphylococcus aureus (methicillin-susceptible and resistant strains), Staphylococcus epidermidis, Staphylococcus saprophyticus, and enterococci.

In vitro profile studies

Gemifloxacin demonstrated good *in vitro* activity against methicillin-susceptible staphylococci, including isolates resistant to erythromycin. As seen with other fluoroquinolones, activity was reduced against methicillin-resistant strains. Methicillin-resistant strains usually have MIC values in the resistant category. Gemifloxacin was active against *Streptococcus pyogenes*, but like other fluoroquinolones had high MIC values for enterococci. In all these studies gemifloxacin generally had MICs that were 2- to 4-fold lower than those of moxifloxacin and trovafloxacin and about 16- to 32-fold lower than those of levofloxacin or ciprofloxacin.

A summary of these studies is shown in TABLE 10.

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TABLE 10
Summary of gemifloxacin and comparator activity against
Aerobic Gram-positive organisms from *in vitro* profile studies

Compound	No. of Isolates	MIC Range (μg/mL)	Range of MIC ₉₀ s (μg/mL)	Median MIC ₉₀ (μg/mL)	References
S. pyogenes					
Gemifloxacin	265	≤0.004-0.06	0.03-0.06	0.03	[35] [33] [34]
Clinafloxacin	100	0.015-0.12	0.06	NA'	[33]
Moxifloxacin	100	0.06-0.5	0.25	NA	[33]
Trovafloxacin	265	0.03-1	0.25	0.25	[35] [33] [34]
Levofloxacin	115	0.06-2	0.5-1	0.5	[35] [33]
Ciprofloxacin	265	0.12-2	0.5-1	1	[35] [33] [34]

S. aureus (not differentiated)					<u> </u>
Gemifloxacin	81	≤0.004-1	0.06-0.12	0.06	[36] [33]
Clinafloxacin	50	0.06-0.25	0.25	NA	[33]
Moxifloxacin	81	0.015-0.5	0.06-0.5	0.06	[36] [33]
Trovafloxacin	81	≤0.004-0.5	0.03-0.25	0.03	[36] [33]
Levofloxacin	81	0.03-2	0.25-2	0.25	[36] [33]
Ciprofloxacin	81	0.06-4	1-4	11	[36] [33]
S. aureus (MSSA)					
Gemifloxacin	599	≤0.004-4	0.03-0.12	0.03	[34] [37] [43]
Moxifloxacin	42	≤0.008-1	0.12	NA	[37]
Trovafloxacin	599	≤0.004-8	≤0.03-0.12	0.03	[34] [37] [43]
Ciprofloxacin	599	≤0.06-≥8	0.5-2	1	[34] [37] [43]
S. aureus (MSSA) CipS	_ .				
Gemifloxacin	15	0.008-0.06	0.06	NA	[35]
Trovafloxacin	15	0.015-0.12	0.06	NA	[35]
Levofloxacin	15	0.12-0.5	0.5	NA	[35]
Ciprofloxacin ,	15	0.12-1	1	NA	[35]
S. aureus (MSSA) CipR					
Gemifloxacin	5	0.12-1	NA	NA	[35]
Trovafloxacin	5	0.12-2	NA	NA	[35]
Levofloxacin	5	1-8	NA	NA	[35]
Ciprofloxacin	5	4-16	NA	NA	[35]

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TABLE 10 (continued)

Summary of gemifloxacin and comparator activity against Aerobic Gram-positive organisms from *in vitro* profile studies

Compound	No. of Isolates	MIC Range (μg/mL)	Range of MIC ₉₀ s (μg/mL)	Median MIC ₉₀ (μg/mL)	References
S. aureus (MRSA)					
Gemifloxacin	447	0.008->16	4-8	8	[34] [37] [43]
Moxifloxacin	49	0.03-4	4	NA	[37]
Trovafloxacin	447	0.008->16	2-8	4	[34] [37] [43]
Ciprofloxacin	447	0.12->64	>8->16	>16	[34] [37] [43]
S. aureus (MRSA) CipS				1	
Gemifloxacin	10	0.015-0.06	0.06	NA	[35]
Trovafloxacin	10	0.03-0.06	0.06	NA	[35]
Levofloxacin	10	0.06-0.5	0.25	NA	[35]
Ciprofloxacin	10	0.25-1	1	NA	[35]
S. aureus (MRSA) CipR	•				
Gemifloxacin	10	0.5-4	2	NA	[35]
Trovafloxacin	10	1-8	4	NA	[35]
Levofloxacin	10	4-16	16	NA	[35]
Ciprofloxacin	10	8->16	>16	NA	[35]

TABLES 11 to TABLE 18 show the results of individual studies for *S. aureus*,

S. pyogenes,

Methicillin-susceptible strains of *S. aureus* are susceptible to gemifloxacin (MIC $_{90}$ s = 0.06-0.12 μ g/mL), but the MIC $_{90}$ value in studies testing methicillin-resistant strains (also ciprofloxacin-resistant) were in the resistant range.

Streptococcus pyogenes had MIC₉₀s of 0.015-0.12 μ g/mL. This organism is associated with respiratory tract infections.

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The MIC₉₀ values for *Enterococcus faecalis* and *Enterococcus faecium* were in the resistant range for gemifloxacin. The MIC₉₀ values for *E. faecalis* were 2->16 μ g/mL and the values were 4-64 μ g/mL for *E. faecium*.

Viridans group streptococci were susceptible to gemifloxacin with MIC $_{90}$ values of 0.06-0.12 μ g/mL. These organisms are not usually associated with the proposed indications.

The Staphylococcus epidermidis studies did not usually separate methicillinsusceptible and –resistant strains. The MIC $_{90}$ values, therefore, were variable and ranged from 0.015 to 2.0 μ g/mL. This species is probably not a primary pathogen and is not associated with any of the proposed indications.

TABLE 11
Activity of Gemifloxacin Against
Staphylococcus aureus (individual studies)

Compound	No. of Isolates	Country	MIC Range	MIC ₅₀ (μg/mL)	MIC ₉₀ (μg/mL)	Reference
			(μg/mL)			[22]
Gemifloxacin	50	Italy	≤0.004-0.12	0.06	0.12	[33]
Gemifloxacin	472 MS	USA	≤0.004-4	0.015	0.03	[34]
	355 MR		0.008-≥16	1.0	810	
Gemifloxacin	31	Canada	0.03-1	0.06	0.06	[36]
Gemifloxacin	10 MR Cip-R	USA	0.05-4	1.0	210	[35]
	10 MR Cip-		0.015-0.06	0.03	0.06	
	<u>S</u>					
	5 MS Cip-R		0.12-1.0	0.25		
	15 MS Cip-S	Ī	0.008-0.06	0.03	0.06	
Gemifloxacin	85 MS	Greece	≤0.03-4	0.06	0.125	[43]
	43 MR		≤0.03-8	2.0	E20	
Gemifloxacin	40 ER-S MS	Когеа	≤0.008-0.12	0.015	0.06	[51]
	28 ER-R MS		≤0.008-0.06	0.015	0.06	
	1 MR ER-S	•	>32]
	21 MR ER-R		≤0.008-≥32	4.0	32	
Gemifloxacin	69 MS	USA	0.008-16	0.015	0.03	[50]
	72 MR		0.015-16	2.0	B <u>r</u> Q	
Gemifloxacin	47 MS	Korea	≤0.008-0.13	0.03	0.06	[52]
	49 MR		≤0.008-4	0.03	M	
Gemifloxacin	20 MS	Korea	≤0.008-0.06	0.03	0.06	[53]
	20 MR	1	0.03->8	1.0	££Q]
Gemifloxacin	346 MS Cip-S	CMI	≤0.008-0.06	0.016	0.03	[31]
	29 MS Cip-R	1	0.03->16	0.5	Big	
	13 MR Cip-S		≤0.008-0.5	0.016	0.06	_1
	160 MR Cip-R	1	0.06-16	2.0	16.0	
Gemifloxacin	199	CAST		≤0.03	2:0	
Gemifloxacin	4012	Alex Proj	≤0.004-0.5	0.015	0.03	[29]

Shaded values are above gemifloxacin susceptible breakpoint

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TABLE 12 Activity of Gemifloxacin Against

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TABLE 14
Activity of Gemifloxacin Against
Streptococcus pyogenes (individual studies)

Compound	No. of Isolates	Country	MIC Range	MIC ₅₀	MIC ₉₀	Reference
			(μg/mL)	(μg/mL)	(μg/mL)	
Gemifloxacin	100 [60 ER-R]	Italy	≤0.004-0.06	0.015	0.03	[33]
Gemifloxacin	150	USA	≤0.004-0.06	0.015	0.03	[34]
Gemifloxacin	15	USA	0.015-0.06	0.03	0.06	[35]
Gemifloxacin	20	USA	≤0.004-0.03	0.015	0.015	[46]
Gemifloxacin	38 [7 ER-R]	Korea	0.016-0.12	0.03	0.06	[51]
Gemifloxacin	54	USA	0.008-0.06	0.016	0.03	[50]
Gemifloxacin	50	UK	≤0.008-0.12	0.03	0.06	[54]
Gemifloxacin	19	Korea	0.016-0.06	0.016	0.03	[52]
Gemifloxacin	20	Korea	0.016-0.12	0.03	0.12	[53]
Gemifloxacin	238	- CMI	≤0.008-0.12	0.03	0.06	[31]
Gemifloxacin	770	Global	0.001-256	0.015	0.03	[28]



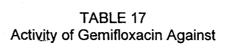
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TABLE 15
Activity of Gemifloxacin Against
Enterococcus faecalis (individual studies)

Compound	No. of Isolates	Country	MIC Range (μg/mL)	MIC ₅₀ (μg/mL)	MIC ₉₀ (μg/mL)	Reference
Gemifloxacin	404 Vanco-S	USA	≤0.03-≥16	0.125	450	[34]
Gemifloxacin	26 Vanco-R		≤0.03-≥16	1.0	410	• •.
Gemifloxacin	15 Vanco-S	USA	0.03-4	0.25	\$20	[35]
	15 Vanco-R		0.03-4	2.0	5;0	
Gemifloxacin	81	Greece	0.03-≥32	0.25	16	[43]
Gemifloxacin	81	USA	0.03-16	0.06	210	[50]
Gemifloxacin	39	Korea	0.06-4.0	0.12	470	[52]
Gemifloxacin	15	Korea	0.06-4.0	0.25	4:0	[53]
Gemifloxacin	377 Vanco-S	CMI	0.016->16	0.06	8:0	[31]
	10 Vanco-R		2->16	16	≥16	1
Gemifloxacin	921	Global	0.004-256	0.06	# Q	[28]

Shaded values are above gemifloxacin susceptible breakpoint

TABLE 16
Activity of Gemifloxacin Against



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TABLE 18
Activity of Gemifloxacin Against

Surveillance Studies

TABLE 19 and TABLE 20 show gemifloxacin MIC₅₀, MIC₉₀, and range for Streptococcus pyogenes, and tested from The Global Gemifloxacin Surveillance Study (GGSS) (28), CAST (30), and CMI (31). The range of MIC₉₀s for the US/Canada isolates was ≤0.03-0.12 μg/mL, and ≤0.03-0.06 μg/mL for all geographic regions for Streptococcus pyogenes and Fhe range of MIC₉₀s for MSSA (excluding the ciprofloxacin-resistant isolates), and was 0.015-0.12 μg/mL for the US/Canada, and ≤0.03-0.06 μg/mL for all geographic regions. Gemifloxacin's MICs against MRSA, ciprofloxacin-resistant MSSA, were all well above the proposed susceptible breakpoint.

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TABLE 19
In vitro Activity of Gemifloxacin against Gram-Positive Isolates from Surveillance Studies—US/Canada

Organism	Study	Number of Isolates	MIC ₅₀ (μg/mL)	MIC ₉₀ (μg/mL)	MIC Range (μg/mL)
Streptococcus	(GGSS)	119	0.015	0.03	0.001-1.0
Pyogenes	CAST	33	≤0.03	≤0.03	≤0.03-0.06
	СМІ	238	0.03	0.06	≤0.008-0.12
Staphylococcus aureus	GGSS	196	0.015	0.12	0.001-16
(MSSA)	CAST	734	≤0.03	≤0.03	≤0.03->4.0
	CMI (Cipro-S)	346	0.016	0.03	≤0.008-0.06
	CMI (Cipro-R)	29	0.5	8.0	0.03->16.0
Staphylococcus	GGSS	132	4.0	8.0	0.004-16.0
Aureus (MRSA)	CAST	506	2.0	>4.0	≤0.03->4.0
	CMI (Cipro-S)	13	0.016	0.06	≤0.008-0.5
	CMI (Cipro-R)	160	2.0	16.0	0.06-16.0

Enterococcus faecalis	GGSS	131	0.06	2.0	0.008-64.0
	CAST	156	0.06	2.0	≤0.03->4.0
	CMI (Cipro-S)	377	0.06	4.0	0.016->16.0
	CMI (Cipro-R)	10	16.0	>16.0	2.0->16.0

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TABLE 20
In vitro Activity of Gemifloxacin against Gram-Positive
Isolates from Surveillance Studies—All geographic Regions

Organism	Study	Number of Isolates	MIC ₅₀ (μg/mL)	MIC ₉₀ (μg/mL)	MIC Range (μg/mL)
Streptococcus	GGSS	770	0.015	0.03	0.001-256
pyogenes	CAST	35	≤0.03	≤0.03	≤0.03-0.06
Staphylococcus aureus	GGSS	842	0.015	0.06	0.001-16
(MSSA)	CAST	860	≤0.03	≤0.03	≤0.03->4
Staphylococcus aureus	GGSS	764	1.0	8.0	0.001-128
(MRSA)	CAST	579	20	>4	<0.03->4
(MRSA) Enterococcus faecalis	CAST	579	0.06	> <i>a</i>	<0.004-256

NA = Not applicable—MIC₉₀ data not presented where number of isolates less than 10

comparator MICs for S. pyogenes, MSSA, MRSA, faecalis, and ~ The tables present the data combined from all three surveillance studies. Only the data from all geographic regions is shown. Gemifloxacin had the lowest MICs of the tested quinolones against S. pyogenes; the MIC $_{90}$ was 0.03 $\mu g/mL$ for the US/Canada and all geographic regions, at least 4-fold lower than the other quinolones. Gemifloxacin also had MIC90 values at least 4-fold lower than the other quinolones against : streptococci. Gemifloxacin's MIC90 was at least 2-fold lower against MSSA than that of the other quinolones tested. Against MSSA, trovafloxacin's and grepafloxacin MIC90 values were only one dilution greater than that of gemifloxacin. Although all these drugs had good activity, trovafloxacin and grepafloxacin may be more active based on a breakpoint that is 8-16 fold greater than that of gemifloxacin's. All quinolones demonstrated poor activity against MRSA and E. faecalis. Since gemifloxacin's susceptible breakpoint will likely be at least 4-fold lower than most other quinolones its activity against most gram-positive aerobes will be at least equivalent and perhaps even better than that of the other tested quinolones (ciprofloxacin, grepafloxacin, levofloxacin, ofloxacin, and trovafloxacin).

TABLES 21 to TABLE 28 show the frequency distribution of gemifloxacin and

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TABLE 21

Frequency Distribution of MICs for *S. pyogenes* in Surveillance Studies (all geographic regions)

							(all ge	ograpii	ic regio		,				40	32	Total
N/Cum%	0.001	0.002	0.004	0.008	0.015	0.03	0.06	0.12	0.25	0.5	1	2	4	8	16	32	
Gemifloxacin	-	13	33	148	558	314	48	6	1		1		1	2			1130
Gemilioxaciii	0.44	1.59	4.51	17.61	66.99	94.78	99.03	99.56	99.65		99.73		99.82	100*			
Oi O	0.44	1.00	7.01	11.01	2	2	4	37	214	686	113	61	11			ł	1130
Ciprofloxacin					0.18	0.35	0.71	3.98	22.92	83.63	93.63	99.03	100*				
					14	37	67	272	271	82	18	4			1	1	767
Grepafloxacin					1.83	6.65	15.38	50.85	86.18	96.87	99.22	99.74			99.87_	100*	
					1.00	0.00	7	12	225	650	76	34		1			1008
Levofloxacin			į		1 40	0.30	0.99	2.18	24.50	88.99	96.53	99.90		100*			
					0.10	0.30		2.10	11	102	572	155	36	3			890
Ofloxacin							8	1.24	2.47	13.93	78.20	95.62	99.66	100*			
							0.90				2	00.02	00.00	1	 		1010
Trovafloxacin					25	81	428	386	42	44	00.00			100*		1	
***	1				2.48	10.50	52.87	91.09	95.25	99.60	99.90			100	1	L	

^{*} Highest concentration tested in one or more of the studies.

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TABLE 22

Frequency Distribution of MICs for *Staphylococcus aureus* (Meth-S) in Surveillance Studies (all geographic regions)

							(all go	ograpii							16	32	Total
N/Cum%	0.001	0.002	0.004	0.008	0.015	0.03	0.06	0.12	0.25	0.5	1 1	2	4	8	16	32	
		7	31	226	315	156	29	11	3	21	19	3	5	7	l		842
Gemifloxacin	9	1 00	1		69.83	88.36	91.81	93.11	93.47	95.96	98.22	98.57	99.17	100*			
	1.07	1.90	5.58	32.42	09.00	00.50		138	285	254	52	19	63				842
Ciprofloxacin					2	2	27			84.09	90.26	92.52	100*				ļ
·		l .			0.24	0.48	3.68	20.07	53.98	04.09	30.20	32.02	2	10	19	19	842
Grepafloxacin				-	65	297	299	100	19	6	4	2 00	04.20	95.49	97.74	100*	• • -
O O Pullonius					7.72	42.99	78.50	90.38	92.64	93.35	93.82	94.06	94.30		31.14	100	842
Levofloxacin			1		4	2	76	436	207	47	13	7	25	25			042
Levolloxaciii					0.48	0.71	9.74	61.52	86.10	91.69	93.23	94.06	97.03	100*			0.40
					01.10		7	46	359	304	50	17	9	50			842
Ofloxacin							0.83	6.29	48.93	85.04	90.97	92.99	94.06	100*			
					470	004	45	29	7	13	32	5	4	12			841
Trovafloxacin					473	221	1		02.15	93.70	97.50	98.10	98.57	100*			1
			1		56.24	82.62	87.87	91.32	92.15	33.70	91.00	30.10	00.07		L		

^{*} Highest concentration tested in one or more of the studies.

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TABLE 23

Frequency Distribution of MICs for Staphylococcus aureus (Meth-R) in Surveillance Studies

(all geographic regions) Total 16 0.25 2 0.12 0.5 0.03 0.06 0.004 0.008 0.015 764 0.002 0.001 N/Cum% 94 94 105 127 170 17 12 12 33 27 61 2 100* 75.39 87.70 Gemifloxacin 61.85 22.77 39.40 18.98 21.20 17.41 13.09 5.10 1.57 764 0.13 0.39 622 10 35 50 25 2 Ciprofloxacin 18.59 100* 10.99 15.58 17.28 1.18 4.45 0.26 0.65 764 259 32 304 19 53 51 9 100* 26.31 66.10 Grepafloxacin 22.12 21.07 21.47 19.24 17.28 18.72 14.79 1.18 7.85 764 377 216 28 16 79 16 2 100* 50.65 Levofloxacin 22.38 16.36 18.46 19.50 12.70 2.36 0.26 764 594 25 10 63 11 22.25 100* Ofloxacin 18.98 17.67 16.23 7.98 0.29 1.83 763 59 241 167 12 38 13 74 100* 79.42 92.27 Trovafloxacin 57.54 16.38 18.22 19.79 25.95 14.68 9.70

^{*} Highest concentration tested in one or more of the studies.

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TABLE 26

Frequency Distribution of MICs for Enterococcus faecalis in Surveillance Studies

(all geographic regions)

							i geogi		9.0		A	Q	16	32	Total
N/Cum%	0.004	0.008	0.015	0.03	0.06	0.12	0.25	0.5	1		4		10	- 52	1514
Gemifloxacin	2	10	41	291	574	109	18	18	80	191	103	77			1014
Germioxaciii	0.13	0.79	3.50	22.72	60.63	67.83	69.02	70.21	75.50	88.11	94.91	100*			
<u> </u>	0.13	0.73	2	3	1	2	23	250	639	115	479				1514
Ciprofloxacin			0.13	0.33	0.40	0.53	2.05	18.56	60.77	68.36	100*				
				0.33	22	95	349	149	17	10	26	23	122	98	920
Grepafloxacin			2	/	1	1	51.63	67.83	69.67	70.76	73.59	76.09	89.35	100*	
			0.22	0.98	3.37	13.70			588	93	11	396			1308
Levofloxacin			1	3	2	2	16	196			1	100*			
			0.08	0.31	0.46	0.61	1.83	16.82	61.77	68.88	69.72		 	 	921
Ofloxacin					2	2	2	13	103	433	91	275	•		321
Ciloxaciii					0.22	0.43	0.65	2.06	13.25	60.26	70.14	100*			4540
T			3	8	26	316	592	85	20	32	99	332			1513
Trovafloxacin			0.20	0.75	2.45	23.33	62,46	68.08	69.40	71.51	78.06	100*		<u> </u>	

^{*} Highest concentration tested in one or more of the studies.

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	b(7) Law Enforcement Records
	

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Figures 3 to 10 show the gemifloxacin data from the surveillance studies for S. pyogenes, MSSA, MRSA, _______ E. faecalis, and ______ Only the data from all geographic regions combined is shown.

Figure 3—Frequency Distribution of gemifloxacin MICs for S. pyogenes From surveillance studies—all geographic regions (n=1,130)

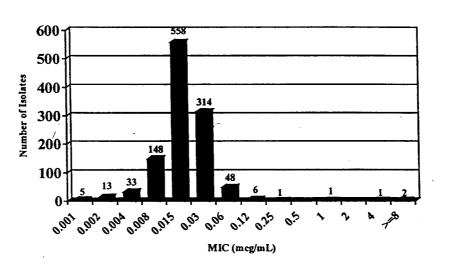
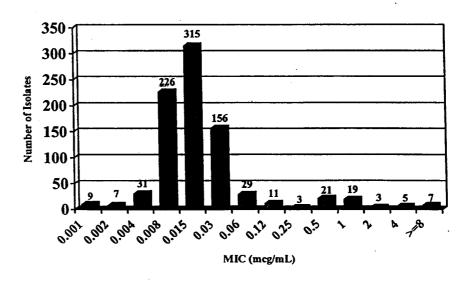


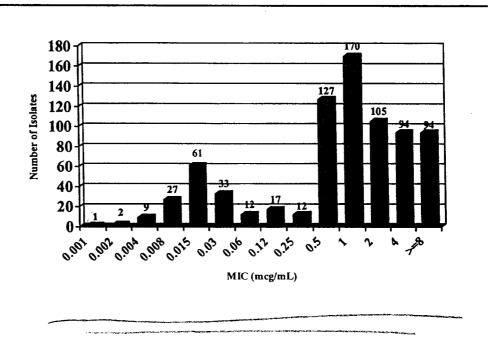
Figure 4—Frequency distribution of gemifloxacin MICs for S. aureus (MSSA)
From surveillance studies—all geographic regions (n-842)



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Figure 5—Frequency distribution of gemifloxacin MICs for S. aureus (MRSA) From surveillance studies—all geographic regions (n-764)



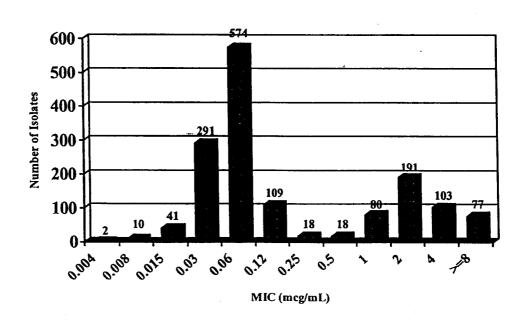
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Figure 8—Frequency distribution of gemifloxacin MICs for *E. faecalis* From surveillance studies—all geographic regions (n = 1,514)





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Clinical data

This section contains frequency distributions of the gemifloxacin MICs for the Gram-positive organisms isolated from the Intent to Treat population during the Phase III clinical studies. The MIC90 for MSSA isolates recovered in North America and from all geographic regions was 0.015 μg/mL. The MIC₉₀ for MRSA from all geographic regions was 8 μg/mL. There were only four isolates of MRSA recovered in North America.

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TABLE 29

Frequency Distribution of MICs for Gemifloxacin for S. aureus (meth-S)

From the Phase III Clinical Studies (North America).

			10,,,							, <u>/</u>			
N=70	0.004	0.008	0.015	0.03	0.06	0.12	0.25	0.5	1	2	4	8	16
Gemi n	3	43	20	2	0	0	0	0	1	0	0	0	1
	4.3	65.7	94.3	97.1	97.1	97.1	97.1	97.1	98.6	98.6	98.6	98.6	100

TABLE 30

Frequency Distribution of MICs for Gemifloxacin for S. aureus (meth-S)

From the Phase III Clinical Studies (all geographic regions)

		From	the Pha	456 III 4	JIII IIUai	Studie	so (an y	googra		<u>910.10/</u>			
N=136	0.004	0.008	0.015	0.03	0.06	0.12	0.25	0.5	1	2	4	8	16
Gemi n	7	74	46	5	1	0	0	0	1	1	0	0	1
Cum %	5.1	59.6	93.4	97.1	97.8	97.8	97.8	97.8	98.5	99.3	99.3	99.3	100
Udill /u	, 0	,											

TABLE 31

Frequency Distribution of MICs for Gemifloxacin for S. aureus (meth-R)

From the Phase III Clinical Studies (all geographic regions)

		LIO	II LIIC F	יוומסט ו		cai Olu	aics (a	ıı goog	,, ap.,,,o	.09.0.		·	
N=12	0.06	0.12	0.25	0.5	1	2	4	8.	16	32	64	128	>256
Gemi n	1	1	1	3	2	0	2	1	0	0	0	0	1
Cum %	83	16.7	25.0	50.0	66.7	66.7	83.3	91.7	91.7	91.7	91.7	91.7	100

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Discussion

The studies outlined above demonstrate that germinoxacin has good activity	
against methicillin-susceptible <i>Staphylococcus aureus</i> . The MIC ₉₀ value is in the range of 0.06-0.12 μg/mL. Like other fluoroquinolones it has poor activity against methicillin-	
· · · · · · · · · · · · · · · · · · ·	
methicillin-susceptible strains have MiCs ≤ 0.12 μg/mL and most methicillin-resistant	
strains have MICs ≥ 0.5 µg/mL. The distribution for	
bipolar as is the distribution for ,data not shown). This is	
Using these data setting a susceptible breakpoint of $\leq 0.12 \mu g/mL$ for staphylococci may	
be appropriate.	
Staphylococcus aureus (methicillin-susceptible strains only) may be placed in the	
label.	
the susceptible breakpoint.	
The MIC ₉₀ value for; is 0.03 μg/mL. Almost 300	
resistant strains. From the frequency distribution of MICs it appears that most methicillin-susceptible strains have MICs ≤ 0.12 μg/mL and most methicillin-resistant strains have MICs ≥ 0.5 μg/mL. The distribution for is bipolar as is the distribution for is bipolar as is the distribution for is bipolar as is the distribution for is data not shown). This is probably due to the non-separation of methicillin-susceptible and methicillin-resistant strains. These strains were not differentiated for these two species in most studies. Using these data setting a susceptible breakpoint of ≤ 0.12 μg/mL for staphylococci mabe appropriate. Staphylococcus aureus (methicillin-susceptible strains only) may be placed in t label. The overall MIC ₉₀ value for is 1.0 μg/mL, which is greater the susceptible breakpoint. The MIC ₉₀ value for is 0.03 μg/mL. Almost 300 isolates were tested. Over 80 isolates were from North America. Isolates were tested more than one study. The MIC ₉₀ value for Streptococcus pyogenes is 0.03 μg/mL. Over 700 isolates were tested. Over 100 isolates were from North America. Streptococcus pyogenes makes tested in the <i>in vitro</i> activity list. The MIC ₉₀ value for is 0.06 μg/mL. Over 800 isolate were tested; over 300 were from North America.	
more than one study.	
• • • • • • • • • • • • • • • • • • • •	
· · · · · · · · · · · · · · · · · · ·	
were tested; over 300 were from North America.	
The NIC analysis for in 0.06 and mill Over 560 isolates	
The MIC ₉₀ value for is 0.00 μg/mL. Over 500 isolates	

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GRAM-NEGATIVE AEROBES

This section contains an overview of the *in vitro* activity of gemifloxacin against Gram-negative aerobes. A primary indication for gemifloxacin will be respiratory tract infections, therefore, there is a particular focus on *Haemophilus influenzae*, *Haemophilus parainfluenzae*, and *Moraxella catarrhalis*.

Haemophilus influenzae, Haemophilus parainfluenzae, and Moraxella catarrhalis

Gemifloxacin has very low MIC values against *Haemophilus* species and *Moraxella catarrhalis*. A number of *in vitro* profile and surveillance studies showed that the MICs for gemifloxacin are similar to those of the newer quinolones (MIC range ≤0.004-0.06 μg/mL). The following section summarizes these studies and presents *Haemophilus* species and *Moraxella catarrhalis* data from the international surveillance studies, in addition to susceptibility data from the Phase III clinical studies.

In vitro profile studies

Early exploratory studies found that gemifloxacin demonstrated excellent *in vitro* activity against *H. influenzae*, *H. parainfluenzae*, and *M. catarrhalis*. Gemifloxacin maintained activity (as does other quinolones) against beta-lactamase producing strains, and isolates of *H. influenzae* resistant to erythromycin (45, 46, 47, 48). These findings were confirmed in more extensive studies. A summary of these results is shown in TABLE 32.

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TABLE 32
Summary of gemifloxacin and comparator activity against
H. influenzae, H. parainfluenzae, and M. catarrhalis from in vitro profile studies

Compound No. of MIC Range Range of Median References MIC₉₀ s MIC₉₀ Isolates (µg/mL) (µg/mL) (µg/mL) H. influenzae (not differentiated) ≤0.008-0.03 ≤0.015 [36] [33] [34] 492 ≤0.004-0.06 Gemifloxacin [49] [43] Clinafloxacin 100 ≤0.008-0.06 ≤0.008 NA [33] Moxifloxacin 145 ≤0.008-0.12 0.06 0.06 [36] [33] Trovafloxacin 492 ≤0.008-0.25 0.015-0.06 0.03 [36] [33] [34] [49] [43] <0.008-0.5 ≤0.015-0.03 0.03 [36] [33][49] Levofloxacin 440 [43] 0.008-0.015 0.015 [36] [33] [34] 445 ≤0.008-0.5 Ciprofloxacin [49] H. parainfluenzae (not/ differentiate) NA [36] ≤0.015-0.12 0.12 10 Gemifloxacin 0.06-0.5 0.5 NA [36] Moxifloxacin 10 [36] 0.12 NA ≤0.015-0.12 Trovafloxacin 10 [36] 0.25 NA Levofloxacin 10 0.03-0.25 NA [36] 0.06 10 ≤0.015-0.06 Ciprofloxacin M. catamhalis 0.015 [36] [33] [49] ≤0.004-0.03 ≤0.015-0.015 145 Gemifloxacin 0.06 [36] [33] 0.06 Moxifloxacin 95 ≤0.004-0.12 [36] [33] [49] 0.03-0.06 0.03 Trovafloxacin 145 ≤0.004-0.06 0.03-0.06 0.06 [36] [33] [49] 145 ≤0.004-0.12 Levofloxacin 0.03 0.03 [36] [33] [49] 145 ≤0.004-0.25 Ciprofloxacin

1 NA = Not applicable—insufficient data to determine a median value

TABLE 33 shows the results of individual profile studies for Haemophilus influenzae. TABLE 34 shows the results of individual profile studies for Haemophilus parainfluenzae. TABLE 35 shows the results of individual profile studies for Moraxella catarrhalis. In all studies gemifloxacin MICs were very low and were in the susceptible range. As usual for fluoroquinolones the MIC90 values were higher for H. parainfluenzae as compared to H. influenzae. Strains that were β -lactamase positive were as susceptible as those that were β -lactamase negative.

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TABLE 33 Activity of Gemifloxacin Against monhilus influenzae (individual studies)

		us intiuenz	ae (individua			
Compound	No. of Isolates	Country	MIC Range	MIC ₅₀	MIC ₉₀	Reference
			(μg/mL)	(μg/mL)	(μg/mL)	
Gemifloxacin	100	Italy	≤0.008-0.06	≤0.008	≤0.008	[33]
Gemifloxacin	52	USA	≤0.0005-0.06	0.008	0.03	[34]
Gemifloxacin	45	Canada	≤0.02-0.03	≤0.02	≤0.02	[36]
Gemifloxacin	20 beta -	USA	0.015-0.12	0.03	0.06	[35]
	16 beta – AmpR		0.008-0.06	0.06	0.06	
•	30 beta +		0.015-0.06	0.03	0.06	
Gemifloxacin	47	Greece	≤0.015	≤0.015	≤0.015	[43]
		-	·			
Gemifloxacin	20 beta -	USA	≤0.004	≤0.004	≤0.004	[46]
	20 beta +		≤0.004	≤0.004	≤0.004	
	19 beta – ampR		_ ≤0.004	≤0.004	≤0.004	
Gemifloxacin	/ 105 Cip-S	USA	≤0.002-0.25	≤0.002	0.008	[48]
	57 amp-R		≤0.002-1	≤0.002	0.03]
	20 ER-R		≤0.002-1	≤0.002	0.12	·
Gemifloxacin	7	Korea	0.008-0.03	0.016		[52]
Gemifloxacin	271	USA	≤0.008-0.06		≤0.008	[47]
		1				
Gemifloxacin	101 beta +	USA	0.004-0.06	0.008	0.016	[49]
	147 beta -		0.004-0.03	0.008	0.016	_
	9 Quin-R		0.03-1	0.25		
Gemifloxacin	86 beta +	CMI	≤0.008-0.016	≤0.008	0.016	[31]
	207 beta -	1	≤0.008-2	≤0.008	0.016	
Gemifloxacin	655	CAST		≤0.004	≤0.004	[30]
Gemifloxacin	4187	Alex Proj	≤0.008-0.5	≤0.008	0.03	[29]
Gemifloxacin	1817	Global	0.001-1	0.004	0.008	[28]

TABLE 34 Activity of Gemifloxacin Against

Haemophilus parainfluenzae (individual studies)

Compound	No. of Isolates	Country	MIC Range (μg/mL)	MIC ₅₀ (μg/mL)	MIC ₉₀ (μg/mL)	Reference
Gemifloxacin	10	Canada	≤0.02-0.12	0.06	0.12	[36]
Gemifloxacin	26	USA	≤0.008-0.06	0.016	0.03	[47]
Gemifloxacin	101	CMI	≤0.008-4	0.016	0.06	[31]
Gemifloxacin	320	Global	0.001-0.12	0.015	0.03	[28]

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TABLE 35
Activity of Gemifloxacin Against
Moraxella catarrhalis (individual studies)

Compound	No. of Isolates	Country	MIC Range	MIC ₅₀	MIC ₉₀	Reference	
oompoon.			(μg/mL)	(μg/mL)	(μg/mL)		
Gemifloxacin	50	Italy	≤0.004-0.03	0.015	0.015	[33]	
Gemifloxacin	45	Canada	≤0.02-0.03	≤0.02	≤0.02	[36]	
Gemifloxacin	9 beta -	USA	≤0.008-0.016	≤0.008	≤0.008	[35]	
	6 beta +	1	≤0.008-0.03	≤0.008	≤0.008		
Gemifloxacin	8 beta -	USA	≤0.004-0.008	≤0.004		[46]	
	20 beta +]	≤0.004-0.008	0.008	0.008		
Gemifloxacin	100	USA	≤0.002-0.016	0.004	0.008	[48]	
Gemifloxacin	184	USA	0.004-0.016	0.008	0.008	[55]	
Gemifloxacin	50	USA	- 0.008-0.03	0.016	0.016	[49]	
Gemifloxacin	/ 163 beta +	CMI	≤0.008-0.03	≤0.008	≤0.008	[31]	
	/ 18 beta -	1	≤0.008-0.016	≤0.008	≤0.008		
Gemifloxacin	263	CAST		≤0.004	0.008	[30]	
Gemifloxacin	633	Alex Proj	≤0.008-0.5	≤0.008	0.015	[29]	
Gemifloxacin	699	Global	0.001-0.12	0.008	0.015	[28]	

Surveillance Studies

TABLE 36 and TABLE 37 show gemifloxacin MIC₅₀, MIC₉₀, and range for Haemophilus influenzae, Haemophilus parainfluenzae, and Moraxella catarrhalis isolates tested from the Global Gemifloxacin Surveillance Study (GGSS) (28), The Alexander Project (29), CAST (30), and CMI (31). The range of MIC₉₀s for *H. influenzae* in the US/Canada was \leq 0.004-0.016 μg/mL and \leq 0.004-0.03 μg/mL for all geographic regions. The range of MIC₉₀s for *H. parainfluenzae* in the US/Canada was 0.03-0.06 μg/mL and 0.03 μg/mL for all geographic regions. The range of MIC₉₀s for Moraxella catarrhalis in the US/Canada was \leq 0.008-0.015 μg/mL and 0.015 μg/mL for all geographic regions.

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TABLE 36
In vitro Activity of Gemifloxacin against *H. influenzae*, *H. parainfluenzae* and *M. catarrhalis* Isolates from Surveillance Studies—US/Canada

Organism	Study	Number of Isolates	MIC ₅₀ (μg/mL)	MIC ₉₀ (μg/mL)	MIC Range (μg/mL)
Haemophilus	(GGSS)	316	0.008	0.008	0.001-0.06
influenzae	Alexander Project	1370	0.008	0.008	0.008-0.06
	CAST	655	≤0.004	≤0.004	≤0.004-0.015
	CMI (β-lactamase positive)	86	≤0.008	0.016	≤0.008-0.016
•	CMI (β-lactamase negative	207	≥0.008	0.016	≤0.008-2.0
Haemophilus	GGSS	56	0.015	0.03	0.001-0.12
parainfluenzae	CAST	4	≤0.03	-	≤0.03
	CMI	101	0.016	0.06	≤0.008-4.0
Moraxella	GGSS	233	0.008	0.008	0.001-0.03
catarrhalis	Alexander Project	191	0.015	0.015	0.008-0.03
	CAST	263	≤0.004	0.008	≤0.004-0.015
	CMI (β-lactamase positive)	163	≤0.008	≤0.008	≤0.008-0.03
	CMI (β-lactamase negative)	18	≤0.008	≤0.008	≤0.008-0.016

TABLE 37
In vitro Activity of Gemifloxacin against *H. influenzae*, *H. parainfluenzae* and *M. catarrhalis* Isolates from Surveillance Studies—All geographic regions

Organism	Study	Number of Isolates	MIC ₅₀ (μg/mL)	MIC ₉₀ (μg/mL)	MIC Range (μg/mL)	
Haemophilus	(GGSS)	1817	0.004	0.008	0.001-1.0	
influenzae	Alexander Project	4188	0.008	0.03	0.008-0.5	
	CAST	847	≤0.004	≤0.004	≤0.004-0.06	
Haemophilus parainfluenzae	GGSS	320	0.015	0.03	0.001-0.12	
Moraxella catarrhalis	GGSS	699	0.008	0.015	0.001-0.12	
	Alexander Project	633	0.008	0.015	0.008-0.5	

TABLES 38 to TABLE 40 show the frequency distribution of gemifloxacin and comparator MICs for *Haemophilus influenzae*, *Haemophilus parainfluenzae*, and *Moraxella catarrhalis*. The tables present the data combined from all four surveillance studies. Only the data from all geographic regions is shown. All fluoroquinolones were active against these three species.

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Trovafloxacin

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TABLE 38

906

97.50

1595

66.85

Frequency Distribution of MICs for Haemophilus influenzae in Surveillance Studies

(all geographic regions) Total 0.06 0.12 0.25 0.5 0.03 0.002 0.004 0.008 0.015 0.001 N/Cum% 7145 2 190 39 592 784 1162 3573 181 612 Gemifloxacin 99.97 99.83 99.99 100 99.94 77.37 88.34 96.63 99.29 27.36 11.10 2.53 7140 13 11 17 201 512 5183 1138 52 Ciprofloxacin 100* 96.79 99.76 99.94 99.96 99.61 96.55 95.83 7.30 79.89 1816 13 <u>10</u> 1492 46 229 Grepafloxacin 99.72 99.89 99.94 100 99.17 98.46 97.30 12.61 94.77 2685 11 15 1544 1055 38 5 Levofloxacin 99.93 100* 98.66 99.63 99.78 99.81 99.22 98.40 96.98 0.19 57.69 6195 207 12 12 16 1321 4048 522 10 46 Ofloxacin 99.79 100 99.60 99.98 96.00 96.26 87.57 0.99 22.23 0.16 271 237 23 Sparfloxacin 87.45 95.94 98.52 100 2956

36

98.71

21

99.42 99.70

* Highest concentration tested in one or more of the studies.

381

12.89

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2

100*

2

99.93

99.86

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TABLE 39

Frequency Distribution of MICs for *Haemophilus parainfluenzae* in Surveillance Studies (all geographic regions)

				0.000		<u> </u>	graphi 0.06	0.12	0.25	0.5	1	2	4	8	Total
N/Cum%	0.001	0.002	0.004	0.008	0.015	0.03		0.12	0.23	4	 		1		425
Gemifloxacin	7	26	38	104	109	95	37	7		1			400		1,20
	1.65	7.76	16.71	41.18	66.82	89.18	97.88	99.53		99.76			100		424
Ciprofloxacin	1.00			7	265	107	15	4	12	8	1	1	4		424
Ciprolloxacin				1.65	64.15	89.39	92.92	93.87	96.70	98.58	98.82	99.06	100*		
				6	134	72	73	18	12	3	1				319
Grepafloxacin				1	43.89	66.46	89.34	94.98	98.75	99.69	100				
				1.88			74	15	7	4	5	1	1		399
Levofloxacin					124	167		1	97.24	98.25	99.50	99.75	100		
					31.08	72.93	91.48	95.49			11	00.70	2	·	323
Ofloxacin				1		3	223	59	12	12	1		100		00
O (10/Lauri)			1	0.31		1.24	70.28	88.54	92.26	95.98	99.38		100		26
Candleyeein				7		7	11	1		1		}			20
Sparfloxacin				26.92	ļ .	53.85	96.15	100		1					
					130	95	105	66	15	3		1		1	424
Trovafloxacin			Ì	8						99.53		99.76]	100*	
Hovanoxacin				1.89	32.55	54.95	79.72	95.28	98.82	99.53		99.76		100*	

^{*} Highest concentration tested in one or more of the studies.

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TABLE 40 Frequency Distribution of MICs for *Moraxella catarrhalis* in Surveillance Studies

(all geographic regions)

				0.000	0.045	<u> </u>	grapine	0.12	0.25	0.5	1	2	4	8	Total
N/Cum%	0.001	0.002	0.004	0.008	0.015	0.03	0.06	0.12	0.23	4	· · · · · · · · · · · · · · · · · · ·				1836
Gemifloxacin	7	24	247	1101	361	87	6	2		1					1000
00,,,,,,,	0.38	1.69	15.14	75.11	94.77	99.51	99.84	99.95		100					4000
Cirrofloyooin	0.00	1.00		7	254	1158	322	10	70	9	2	1	3		1836
Ciprofloxacin				0.38	14.22	77.29	94.83	95.37	99.18	99.67	99.78	99.84	100*		
				0.00	619	37	8	3	4	1	1			1	674
Grepafloxacin				Ì		1	98.52	98.96	99.55	99.70	99.85	1		100	
					91.84	97.33				4	4	1			1203
Levofloxacin				2	33	935	207	8	9	90.50	00.00	100			,
				0.17	2.91	80.63	97.84	98.50	99.25	99.58	99.92				1392
Oflowagin	-	 -			1	1	705	601	5	66	5	6	1	1	1392
Ofloxacin		1			0.07	0.14	50.79	93.97	94.32	99.07	99.43	99.86	99.93	100*	
	ļ			108	729	344	9	5	5	1	1	1			1203
Trovafloxacin			ĺ	1		1 -	98.92	99.33	99.75	99.83	99.92	100			
	1		1	8.98	69.58	98.17	90.92	33.33	33.70	00.00	1		L		J

^{*} Highest concentration tested in one or more of the studies.

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Figures 11 to 13 show the gemifloxacin data from the surveillance studies in bar graphs for *Haemophilus influenzae*, *Haemophilus parainfluenzae*, and *Moraxella catarrhalis*. Only the data from all geographic regions combined is shown.

Figure 11—Frequency distribution of gemifloxacin MICs for *H. influenzae* From surveillance studies—all geographic regions (n = 2,820)

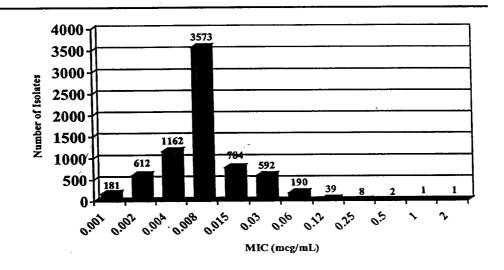
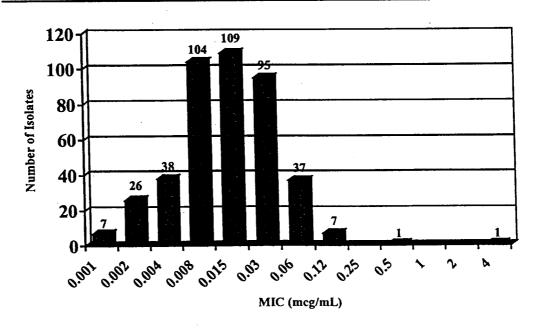


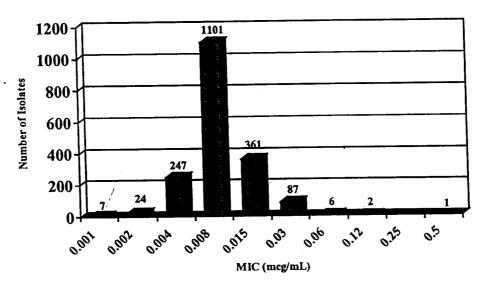
Figure 12—Frequency distribution of gemifloxacin MICs for *H. parainfluenzae*From surveillance studies—all geographic regions (n = 425)



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Figure 13—Frequency distribution of gemifloxacin MICs for *M. catarrhalis* From surveillance studies—all geographic regions (n = 1,836)



Clinical data

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This section contains frequency distributions of the gemifloxacin MICs for the Haemophilus influenzae isolated from the Intent to Treat population during the Phase III clinical studies. The MIC $_{90}$ for H. influenzae isolates recovered in North America and from all geographic regions was 0.008 μ g/mL.

TABLE 41
Frequency Distribution of MICs for Gemifloxacin for *H. influenzae*From the Phase III Clinical Studies (North America)

		Fron	n me en	iase III c	ziii iibai k	JUUIC 3	(140)111	7 1111011	ou,			
N=89	≤0.001	0.002	0.004	0.008	0.015	0.03	0.06	0.12	0.25	0.5	1	2
Gemi n	9	50	20	6.	2	0	0	0	0	0	0	1
Cum %	10.1	66.3	88.8	95.3	97.8	97.8	97.8	97.8	97.8	97.8	97.8	100

TABLE 42
Frequency Distribution of MICs for Gemifloxacin for *H. influenzae*From the Phase III Clinical Studies (all geographic regions)

		, , ,		11000 111			, \ 		7		1 4		1 2000
N=297	≤0.001	0.002	0.004	0.008	0.015	0.03	0.06	0.12	0.25	0.5	1	2	>256
				0.4	44	1 4	7	1		- 0	ln	1 1	1 1
Gemi n	38	137	1 //	21	11	1 4	1 4		10	1		 	
	12.0	60.3	86.2	93.3	97.0	98.3	99.0	99.3	99.3	99.3	99.3	99.7	100'
Cum %	12.8	00.5	00.2	33.3	101.0	1 00.0	1	1			<u> </u>	<u> </u>	

MIC₁₀₀ = >256 μg/mL—it is likely this is a laboratory error

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Discussion

The studies outlined in this section demonstrate that gemifloxacin has good activity against *Haemophilus influenzae*, *Haemophilus parainfluenzae*, and *Moraxella catarrhalis*.

The MIC₉₀ value for H. influenzae was $\le 0.06 \, \mu g/mL$. In most studies the MIC₉₀ was 0.008 or 0.016 $\mu g/mL$. Over 7000 isolates were tested with over 2500 isolates from North America. Haemophilus influenzae will be allowed in the label unless clinical efficacy is not proven.

The MIC₉₀ value for *H. parainfluenzae* was \leq 0.12 µg/mL in all studies. The overall MIC₉₀ value in the surveillance studies was 0.06 µg/mL. Over 400 isolates were tested with over 160 isolates from North America. *Haemophilus parainfluenzae* will be allowed in the label unless clinical efficacy is not proven.

The MIC₉₀ value for *M. catarrhalis* was \leq 0.015 µg/mL in all studies. Over 1800 isolates were tested with over 900 North American isolates. *Moraxella catarrhalis* will be allowed in the label unless clinical efficacy is not proven.

Other Gram-Negative Aerobes

To determine the activity of gemifloxacin against Gram-negative aerobes, other than *Haemophilus influenzae*, *Haemophilus parainfluenzae*, and *Moraxella catarrhalis*, a number of *in vitro* susceptibility studies were conducted.

In vitro profile studies

Most studies demonstrated that gemifloxacin had variable *in vitro* activity against gram-negative organisms. Most species had MIC₉₀ values close to or at the susceptible breakpoint. The MIC₅₀ values in most studies were several dilutions lower than the MIC₉₀ values. The few studies that separated strains containing extended spectrum beta-lactamases (ESBLs) indicated that these strains were not susceptible to gemifloxacin. Certain species such as and species had MICs that were higher than for most other Enterobacteriaceae. In general the activity of gemifloxacin was equivalent to or one-dilution less than that of ciprofloxacin, but ciprofloxacin's susceptible breakpoint is 4 times higher.

A summary of these studies is shown in TABLE 43.

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TABLE 43
Summary of gemifloxacin and comparator activity against
Aerobic Gram-negative organisms from *in vitro* profile studies

Compound	No. of Isolates	MIC Range (μg/mL)	Range of MIC ₉₀ s (μg/mL)	Median MIC ₉₀ (μg/mL)	References
					FO 435403
Gemifloxacin	828	≤0.002->16	0.03-0.25	0.03	[34][43]
Trovafloxacin	828	≤0.002->16	0.06-0.25	0.06	[34] [43]
Ciprofloxacin	828	≤0.002->8	0.015-0.25	0.015	[34] [43]
K. pneumoniae					10.41.50.51
Gemifloxacin	535	≤0.008->16	0.25-8	0.5	[34] [35] [33] [43]
Clinafloxacin	50	≤0.008-1	1	NA ^t	[33]
Moxifloxacin	50	0.015-1	0.5	NA	[33]
Trovafloxacin	535	≤0.008->16	0.5-8	1	[34] [35] [33] [43]
Levofloxacin	/	0.015->16	0.5-1	0.5	[35] [33]
Ciprofloxacin	535	≤0.008->16	0.5->8	0.5	[34] [35] [33] [43]
Gemifloxacin	29	≤0.06->16	0.5	NA	[34]
Trovafloxacin	29	≤0.12->16	0.5	NA	[34]
Ciprofloxacin	29	≤0.06->8	0.25	NA	[34]
Oigi	245	≤0.03->64	0.25-16	0.25	[34] [35] [43]
Gemifloxacin	245	≤0.03->64	1-16	1	[34] [35] [43]
Trovafloxacin	243	0.06->16	0.12	NA	[35]
Levofloxacin Ciprofloxacin	245	≤0.03->64	0.06-16	0.06	[34] [35] [43]
		0.045 >46	0.12-2	0.12	[34] [35]
Gemifloxacin	89	0.015->16 0.03->16	0.12-2	0.25	[34] [35]
Trovafloxacin	20	0.03-2	0.25	NA NA	[35]
Levofloxacin Ciprofloxacin	89	0.015-4	0.12-0.5	0.12	[34] [35]
Ciprolloxacin	03	0.010			
Gemifloxacin	54	0.06->16	1-4	1	[34] [35]
Trovafloxacin	54	0.06->16	2->16	2	[34] [35]
Levofloxacin	20	0.03-4	0.5	NA	[35]
Ciprofloxacin	54	0.03->8	0.5-4	0.5	[34] [35]
Gemifloxacin	687	0.06->64	2->64	>16	[34] [59] [43]
Trovafloxacin	687	0.06->64	4->64	>16	[34] [59] [43]
Levofloxacin	200	0.03-64	4	NA	[59]
Ciprofloxacin	687	0.015->64	1-64	>8	[34] [59] [43]
Gemifloxacin	19	4-64	64	NA	[35] [59]
Trovafloxacin	19	8->64	>64	NA	[35] [59]
Levofloxacin	19	8-64	64	NA	[35] [59]
Ciprofloxacin	19	2-32	32	NA	[35] [59]

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TABLE 43 (continued)

Summary of gemifloxacin and comparator activity against Aerobic Gram-negative organisms from *in vitro* profile studies

Compound	No. of	MIC Range	Range of	Median	References
- ·	Isolates	(μg/mL)	MIC ₉₀ s	MIC ₉₀	
_			(μg/mL)	(μg/mL)	
				 	1051
Gemifloxacin	26	0.03-4	1	NA	[35]
Trovafloxacin	26	0.06-4	1	NA	[35]
Levofloxacin	26	0.06-4	2	NA NA	[35]
Ciprofloxacin	26	0.03-2	1	NA	[35]
Gemifloxacin	20	0.25-16	2	NA	[35]
Trovafloxacin	20	0.12-16	2	NA	[35]
Levofloxacin	20	0.5-16	4	NA	[35]
Ciprofloxacin	20	1->16	8	NA	[35]
			40		1763
Gemifloxacin	160	≤0.03-32	16	NA	[75]
Trovafloxacin	160	≤0.03-32	16	NA	[75]
Levofloxacin	160	≤0.03-32	16	NA	[75]
Ciprofloxacin	160	≤0.03->125	128	NA NA	[75]
Gemifloxacin	234	≤0.12->16	>16	NA NA	[34]
Trovafloxacin	234	≤0.12->16	>16	NA	[34]
Ciprofloxacin	234	≤0.06->8	>8	NA	[34]
				A14	F2.51
Gemifloxacin	20	0.008-0.25	0.06	. NA	[35]
Trovafloxacin	20	0.008-0.25	0.12	NA_	[35]
Levofloxacin	20	0.03-1	0.25	NA	[35]
Ciprofloxacin	20	0.008-1	0.5	NA NA	[35]

NA = Not applicable—insufficient data to determine a median value

TABLES 44 to 65 shows the results of individual profile studies for some important Gram-negative organisms. Individual tables have been included for each of the organisms the sponsor has included in the proposed label. Individual tables have also been included for a few of the more common Gram-negative organisms that have high gemifloxacin MIC values and have not been included in the sponsor's proposed label. As is evident from these tables, gemifloxacin's activity is variable for most of these species. In almost all species many MIC $_{90}$ values are close to the proposed susceptible breakpoint of 0.25 μ g/mL. Most species had numerous studies with high MIC $_{90}$ values.

² Includes

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TABLE 44
Activity of Gemifloxacin Against

TABLE 45
Activity of Gemifloxacin Against
Acinetobacter Iwoffi (individual studies)

Country MIC Range MIC₅₀ MIC₉₀ Reference Compound No. of Isolates (µg/mL) $(\mu g/mL)$ (µg/mL) Gemifloxacin 7 CMI ≤0.008-0.06 0.016 [31] Gemifloxacin 124 Global 0.001-16 0.03 0.25 [28]

Over 100 isolates have been tested and more than one study has been performed. The MIC₉₀ values are below the susceptible breakpoint. *Acinetobacter lwoffi* may remain in the *in vitro* activity listing.

TABLE 46
Activity of Gemifloxacin Against

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TABLE 52
Activity of Gemifloxacin Against
Klebsiella pneumoniae (individual studies)

Compound	No. of Isolates	Country	MIC Range (μg/mL)	MIC ₅₀ (μg/mL)	MIC ₉₀ (μg/mL)	Reference
Gemifloxacin	50	Italy	≤0.008-1	0.03	0.25	[33]
	20 ESBL +	İ	0.03-1	0.25	0.5	
	30 ESBL -		≤0.008-0.12	0.015	0.06	
Gemifloxacin	409	USA	≤0.03-≥16	0.06	8.0	[34]
Gemifloxacin	20	USA	0.008->16	0.06	a to	[35]
Gemifloxacin	56	Greece	≤0.03-4	0.06	25	[43]
Gemifloxacin	20	USA	0.015->8	0.03	0.12	[46]
Gemifloxacin	45	Korea	0.016-1	0.06	0.25	[51]
Gemifloxacin	45	Korea	0.016-2	0.12	0.25	[52]
Gemifloxacin	20	Korea	0.03-8	0.06	110	[53]
Gemifloxacin	149	USA	0.008-32	0.03	0.25	[57]
Gemifloxacin	255	CMI -	≤0.03-≥16	0.06	810	[31]
Gemifloxacin	1820	Global	0.002->256	0.03	0,5	[28]
	282	USA		0.03	0.25	1

Shaded values are above gemifloxacin susceptible breakpoint

Several studies have high MIC_{90} values. Most of the other studies had MIC_{90} values of 0.25 μ g/mL (breakpoint concentration). This species is included in the clinical efficacy section of the label. If clinical efficacy is not shown then it must be eliminated from the label.

TABLE 53
Activity of Gemifloxacin Against
Klebsiella oxytoca (individual studies)

Compound	No. of Isolates	Country	MIC Range (μg/mL)	MIC ₅₀ (μg/mL)	MlC ₉₀ (μg/mL)	Reference
Gemifloxacin	26	USA	≤0.03-≥16	≤0.03	0.25	[39]
Gemifloxacin	10	USA	0.016-0.06	0.03	0.03	[46]
Gemifloxacin	48	Korea	0.03-0.06	0.06	0.06	[52]
Gemifloxacin	59	USA	0.008-8	0.016	0.25	[57]
Gemifloxacin	103	CMI	≤0.008-8	0.03	0.25	[31]
Gemifloxacin	710	Global	0.002-8	0.03	0.06	[28]
	126	USA		0.015	0.25	1

Over 100 isolates were tested. More then one study was performed. All MIC₉₀ values were $\leq 0.25 \ \mu g/mL$. Klebsiella oxytoca may remain in the *in vitro* activity listing in the label.

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TABLE 56
Activity of Gemifloxacin Against
Proteus vulgaris (individual studies)

Compound	No. of Isolates	Country	MIC Range (μg/mL)	MIC ₅₀ (μg/mL)	MIC ₉₀ (μg/mL)	Reference
Gemifloxacin	20	USA	0.06-0.25	0.12	0.25	[35]
Gemifloxacin	10	USA	0.03-0.5	0.03	0.12	[46]
Gemifloxacin	20	Korea	0.03-0.25	0.06	0.06	[52]
Gemifloxacin	12	Korea	0.12->8	0.25	28	[53]
Gemifloxacin	25	СМІ	≤0.008-1	0.06	0.25	[31]
Gemifloxacin	424	Global	0.004-8	0.12	0.25	[28]
	23	USA		0.06	0.12	1

Shaded values are above gemifloxacin susceptible breakpoint

Over 100 isolates have been tested. Only one small Korean study had a MIC₉₀ value greater than 0.25 µg/mL. *Proteus vulgaris* may remain in the *in vitro* listing.

TABLE 57
Activity of Gemifloxacin Against

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TABLE 65
Activity of Gemifloxacin Against

Surveillance Studies

TABLE 66 and TABLE 67 show gemifloxacin MIC ₅₀ , MIC ₉₀ , and range for
Klebsiella pneumoniae,
Acinetobacter Iwoffi,
isolates tested from The Global
Semifloxacin Surveillance Study (GGSS) (28), CAST (30), and CMI (31). The range of
/IIC ₉₀ s for —— in the US/Canada was ≤0.03-0.03 μg/mL and 0.06-0.25 μg/mL for all
eographic regions. The range of MIC ₉₀ s for in the US/Canada was
0.25-2.0 μg/mL and was 4-8 μg/mL for all geographic regions. The range of MIC ₉₀ s for
pneumoniae in the US/Canada was 0.25-0.5 μg/mL and was 0.5 μg/mL for all
peographic regions. The range of MIC ₉₀ s for in the US/Canada and all
geographic regions was 0.25-0.5 μg/mL. The range of MIC ₉₀ s for 's in the
JS/Canada was 0.25 μg/mL and 4.0-16.0 μg/mL for all geographic regions. Some
solates outside of the US/Canada had higher MIC values and these caused the MIC90
values to be higher in these foreign studies. Gemifloxacin was much less active against
and the listed in the table with the exception of A.
woffi with a MIC ₉₀ range of ≤0.03-0.06 μg/mL in the US/Canada and 0.25 μg/mL for all
geographic regions. There were no significant differences in the activity of gemifloxacin
against isolates collected in Europe and those collected in North America except for
and K. pneumoniae, which had MIC ₉₀ s of ≤0.25 μg/mL in North America, but
>0.25 μg/mL in Europe.

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TABLE 66 In vitro Activity of Gemifloxacin against Gram-Negative Isolates from Surveillance Studies—US/Canada

Isolates	MIC ₅₀	MIC ₉₀	
1	(μg/mL)	(μg/mL)	MIC Range (μg/mL)
			_
1000		T a a a	
			0.002-256
263		0.25	≤0.03->4
255	0.03	0.5	<0.008-8
255	0.03	0.5	<0.008-8
255 11 4	0.03 0.03 ≤0.03	0.06 NA*	0.004-0.5 ≤0.03
	282 263		